

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
(PHILADELPHIA)**

IN RE:

**Alessandro B. Micozzi**

**Kristi M. Micozzi**

Debtors

CHAPTER 13

CASE NO.: **19-13556-mdc**

**CERTIFICATION OF DEFAULT**

NOW COMES the Movant, Wilmington Trust, National Association, not in its Individual Capacity, but solely as Trustee for MFRA Trust 2014-2, by and through its attorneys, Hill Wallack LLP, who file this Certification of Default upon the following:

1. A Motion for Relief from Stay was filed on April 8, 2020 at Doc. No. 35.
2. Debtor filed a response to the Motion for Relief from Stay which was filed on April 13, 2020 at Doc. No. 37.
3. As a results of the hearing, the Debtor and Movant entered into a Bench Order Resolving Objection to Motion for Relief from Stay wherein the Debtor was to make a payment in the amount of \$6,000.00 and file an Amended Plan to provide for rest of the arrears in the amount of \$12,967.82 and agreed to remain current on all regular post-petition monthly mortgage payments. A true and correct copy of the Proposed Order is attached hereto and made a part hereof as Exhibit "A."
4. On or about May 13, 2020 the court entered an Order approving the Proposed Order. *See, Doc. No. 40.*
5. The Order provided that should the debtor fail to comply with the conditions set forth in the order relief shall be granted upon certification of default by Movant's counsel. *See, Stipulation at ¶6.*

6. The Debtors failed to make the payments required under the Stipulation on August 1, 2020.
7. The debtors are currently due for August to October monthly payments in the amount of \$1,974.23 each in the amount of \$5,922.69 with \$1,911.78 in suspense for a total due of \$4,010.91.
8. As such, Wilmington Trust, National Association, not in its Individual Capacity, but solely as Trustee for MFRA Trust 2014-2 respectfully requests that the attached Order in connection with the Motion for Relief from Stay be entered.

**Hill Wallack LLP**

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